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United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
YVETTE GALLEGOS,  
  
Defendant.

CASE NO. 1:21-CR-00095-NODJ-BAM-8

JOINT STATUS REPORT, STIPULATION AND  
ORDER

**STIPULATION**

COMES NOW, Defendant, YVETTE GALLEGOS, by and through her attorney of record, Mr. Roger Wilson, and The United States of America, hereby stipulate as follows:

1. By previous order, this matter was set for trial on July 30, 2024 with a trial confirmation hearing on July 15, 2024. ECF 220, 224. Time was previously excluded through July 30, 2024. *Id.* The parties anticipate that this case will resolve short of trial.

2. The parties are in active plea negotiations and have verbally reached a potential agreement. As such, the defendant now moves to vacate the trial, the trial confirmation hearing, and the upcoming status conference scheduled for June 12, 2024. The parties request a change of plea be scheduled for August 12, 2024. This will allow the parties sufficient time to finalize the plea.

3. The parties further request that the Court exclude time from July 30, 2024 until August

12,2024. Exclusion of time is necessary to ensure continuity of counsel and to ensure counsel has sufficient time to review, investigate, and advise his client of the terms of the plea agreement. August 12, 2024 is the earliest date that the parties are available and the Court is available.

The government does not object to and joins in this request.

IT IS SO STIPULATED.

Dated: June 10, 2024

PHILLIP A. TALBERT  
United States Attorney

/s/ ARIN C. HEINZ  
ARIN C. HEINZ  
Assistant United States Attorney

Dated: June 10, 2024

/s/ ROGER WILSON  
ROGER WILSON  
Counsel for Defendant  
YVETTE GALLEGOS

**ORDER**

IT IS SO ORDERED that the jury trial set for July 30, 2024, trial confirmation set for July 15, 2024 and status conference set June 12, 2024 are vacated. A change of plea hearing is set for **August 12, 2024, at 8:30 a.m. in Courtroom 5 before the District Court Judge.** Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv).

IT IS SO ORDERED.

Dated: June 10, 2024

/s/ *Barbara A. McAuliffe*  
UNITED STATES MAGISTRATE JUDGE